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SHIOW-HUEY CHANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SHIOW-HUEY CHANG,

Plaintiff,

vs.

COUNTY OF SANTA CLARA, a public
entity, SANTA CLARA COUNTY
SHERIFF'S OFFICE, a department of the
County of Santa Clara, DEPUTY DANIEL J.
FOREST, an individual, DEPUTY
STRICKLAND, an individual, and DOES 1-
50, inclusive,

Defendants.

Case No. Case No. 15-cv-02502 RMW (NC)

**STIPULATION TO EXTEND
DISCOVERY DEADLINE; ~~[PROPOSED]~~
ORDER**

Pursuant to Federal Rules of Civil Procedure, Rule 29, and Civil Local Rules 6-2 and 7-12, Plaintiff, Shioh-Huey Chang, and Defendants hereby request an extension of the fact discovery cut-off in this case. Under the Order After Initial Case Management Conference, the current fact discovery deadline is November 25, 2015. The parties request the deadline be extended to February 18, 2016.

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1 **REASONS FOR ENLARGEMENT OF TIME**

2 This action commenced on June 5, 2015. Defendants filed an answer to the complaint on
3 July 1, 2015. The Initial Case Management Conference (“initial CMC”) was held on September
4 14, 2015.

5 The parties sought discovery at their earliest opportunity, and discovery has continued in
6 earnest. Pursuant to the Court’s order following the initial CMC, fact discovery is scheduled to
7 close next month. However, the parties believe their preparation for trial would benefit from
8 additional time to conduct fact discovery.

9 In addition, during discovery, plaintiff has ascertained the names of percipient witnesses,
10 all employees or former employees of the defendant County of Santa Clara. An enlargement of
11 the deadline to complete discovery will allow the parties to select deposition dates convenient to
12 counsel and the witnesses.

13 Lastly, this matter is scheduled for a settlement conference before Magistrate Nathanael
14 Cousins on December 8, 2015. The parties would like to reserve the possibility to conduct
15 discovery after the settlement conference, and thereby conserve resources in the event the matter
16 settles in December.

17 **ALL PREVIOUS TIME MODIFICATIONS**

18 There have been no time modifications in this case to date.

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EFFECT OF REQUESTED TIME MODIFICATION

This request would have no effect on other deadlines previously set by the Court.

IT IS SO STIPULATED.

DATED: October 19, 2015

McMANIS FAULKNER

/s/

JAMES McMANIS

Attorneys for Plaintiff

DATED: October 19, 2015

/s/

DAVID ROLLO

Attorneys for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/22/2015



United States District Judge